

Sander L. Esserman (admission *pro hac vice* pending)

Peter C. D'Apice

STUTZMAN, BROMBERG, ESSERMAN &

PLIFKA, A Professional Corporation

2323 Bryan Street, Suite 2200

Dallas, TX 75201

Telephone: 214-969-4900

Facsimile: 214-969-4999

esserman@sbep-law.com

dapice@sbep-law.com

Counsel to Certain Native

American Tribes, Health Organizations,

Municipalities and Unions

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X)	
)	
In re)	Chapter 11
)	
PURDUE PHARMA L.P., et al.,)	Case No. 19-23649 (RDD)
)	
Debtors.)	(Jointly Administered)
)	
-----X		

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Sander L. Esserman and Peter C. D'Apice of Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, hereby appear in the above-captioned jointly-administered cases ("**Cases**") as counsel for the parties in interest listed on the attached Exhibit A ("**Certain Native American Tribes**") and Exhibit B (Certain Health Organizations, Municipalities, and Unions (collectively "**Other Represented Parties**")) and request, pursuant to Section 1109(b) of title 11 of the United States Code (as amended, the "**Bankruptcy Code**") and Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (as amended, the "**Bankruptcy Rules**") that any and all notices and

papers filed or entered in these Cases be delivered and served upon:

Sander L. Esserman
Peter C. D'Apice
Stutzman, Bromberg, Esserman & Plifka,
A Professional Corporation
2323 Bryan Street
Suite 2200
Dallas, TX 75201
(214) 969-4900
(214) 969-4999 (facsimile)
esserman@sbep-law.com
dapice@sbep-law.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules, but also includes without limitation copies of all papers, orders, reports, schedules, plans, disclosure statements (including drafts thereof), answering/reply papers, and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronic mail, or otherwise that is filed in these Cases or in any related adversary proceeding.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (this “**Notice**”) nor any later appearance, pleading, claim, proof of claim, motion or suit shall constitute a waiver of any substantive right or consent on the part of the Certain Native American Tribes and/or the Other Represented Parties (or any of them), including without limitation (i) the sovereignty of the Certain Native American Tribes (or any of them); (ii) the right to have final orders in non-core matters entered only after *de novo* review by a District Court; (iii) the right to trial by jury in any proceeding so triable; (iv) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary

withdrawal or abstention; (v) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice; (vi) any rights of the Certain Native American Tribes (or any of them) and/or the Other Represented Parties (or any of them) under the Constitution of the United States, including without limitation Article III thereof; and (vii) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements (all of which rights, claims actions, defenses, setoffs or recoupments are expressly reserved).

PLEASE TAKE FURTHER NOTICE that this Notice does not constitute an agreement to accept service of initial process under Rule 4 of the Federal Rules of Civil Procedure or Rule 7004 of the Federal Rules of Bankruptcy Procedure, nor shall it result in undersigned counsel being deemed the agent of the Certain Native American Tribes (or any of them) and/or the Other Represented Parties (or any of them) for such purposes.

October 7, 2019
Dallas, Texas

Respectfully submitted,

STUTZMAN, BROMBERG, ESSERMAN
& PLIFKA, A PROFESSIONAL
CORPORATION

By: /s/ Peter C. D'Apice

Sander L. Esserman (Admission *Pro Hac Vice*
pending)

2323 Bryan Street, Suite 2200
Dallas, TX 75201

Telephone: (214) 969-4900

Facsimile: (214) 969-4999

esserman@sbep-law.com

dapice@sbep-law.com

**COUNSEL FOR CERTAIN NATIVE
AMERICAN TRIBES, HEALTH
ORGANIZATIONS, MUNICIPALITIES AND
UNIONS**

EXHIBIT A

The Certain Native American Tribes

1. Bad River Band of Lake Superior Tribe of Chippewa Indians/Bad River Health & Wellness Center
2. Battle Mountain Band of Te-Moak Tribe of Western Shoshone Indians
3. Big Sandy Rancheria of Mono Indians
4. Big Valley Band of Pomo Indians
5. Cahto Tribe of the Laytonville Rancheria
6. Cher-Ae Heights Indian Community of the Trinidad Rancheria
7. Cheyenne & Arapaho Tribes and Clinic
8. Chicken Ranch Rancheria of Me-Wuk Indians
9. Chitimacha Tribe of Louisiana
10. Coyote Valley Band of Pomo Indians
11. Ely Shoshone Tribe of Nevada
12. Ewiiapaayp Band of Kumeyaay Indians
13. Fallon Paiute-Shoshone Tribe
14. Fond du Lac Band of Superior Chippewa
15. Guidiville Rancheria of California
16. Ho Chunk Nation
17. Hopland Band of Pomo Indians
18. Koi Nation
19. Lac Courte Oreilles Band of Lake Superior
20. Lac du Flambeau Band of Lake Superior Ind.
21. Manchester Band of Pomo Indians
22. Mentasta Traditional Council
23. Pinoleville Pomo Nation
24. Potter Valley Tribe
25. Pueblo of Pojoaque
26. Pyramid Lake Paiute Tribe
27. Red Cliff Band of Lake Superior Chippewas
28. Redwood Valley Tribe
29. Reno-Sparks Indian Colony
30. Resighini Rancheria
31. Robinson Rancheria of Pomo Indians
32. Round Valley Indian Tribes and Round Valley Indian Health Center
33. Scotts Valley Band of Pomo Indians
34. Shinnecock Indian Nation
35. South Fork Band of the Te-Moak Tribe of Western Shoshone Indians
36. St. Croix Chippewa Indians of WI
37. Walker River Paiute Tribe
38. Wampanoag Tribe of Gay Head (Aquinnah)

EXHIBIT B

Health Organizations

1. Apollo MD Business Srvs, LLC
2. Baptist Hospital, Inc. (Baptist Hospital, Jay Hospital)
3. Center Point, Inc.
4. Community Based Care of Brevard, Inc. dba Brevard Family Partnership
5. Community Partnership for Children, Inc.
6. Consolidated Tribal Health Project, Inc.
7. El Campo Memorial Hospital and West Wharton County Hospital District
8. Gonzales Healthcare Systems
9. Greenwood Leflore Hospital
10. Howard Center, Inc.
11. J. Paul Jones Hospital
12. Kids First of Florida, Inc.
13. Lakeview Center, Inc.
14. North Mississippi Medical Center, Inc.
15. Ochiltree County Hospital District
16. Odyssey House; Addiction Recovery Resources, Inc.
17. Pearl River County Hospital & Nursing Home
18. Rush Health Systems, Inc.
19. Seattle Indian Health Board
20. Sharkey-Issaquena Hospital
21. South Central Regional Medical Center
22. Westcare Foundation, Inc.

Municipalities

1. Harrison County, Mississippi
2. Issaquena County, Mississippi
3. Town of Butler, Alabama

Unions

1. United Food & Commercial Workers Union Local 1995 & Employers Health and Welfare Fund
2. United Food & Commercial Workers Local 1000 Oklahoma Health & Welfare Fund
3. South Central United Food & Commercial Workers Union & Employers Health & Welfare Trust Fund
4. United Food & Commercial Workers Union Local 1529 & Employers Health & Welfare Plan and Trust
5. United Food & Commercial Workers Unions and Employers Health and Welfare Fund - Atlanta